

	)	
SECURITIES AND EXCHANGE COMMISSION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:16-cv-00107
	)	
RHODE ISLAND COMMERCE	)	
CORPORATION, et al.,	)	
	)	
Defendants.	)	
	)	

For the reasons set forth in the accompanying Memorandum of Law and pursuant to Federal Rule of Civil Procedure 12(b)(6), defendant Wells Fargo Securities, LLC (“Wells Fargo”) hereby moves to dismiss with prejudice all claims against Wells Fargo in the Complaint.

WHEREFORE, Wells Fargo respectfully requests that the Court: (1) grant this motion; (2) dismiss all claims against Wells Fargo in the Complaint (*i.e.*, the first, second, fifth, sixth, and seventh claims) with prejudice and without leave to amend; and (3) order such other relief as the Court deems just and necessary.

Respectfully submitted,

*/s/ Luke T. Cadigan*

*/s/ Christopher J. Valente (by LTC with permission)*

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Dated: May 9, 2016

**CERTIFICATE OF SERVICE**

I hereby certify that on May 9, 2016, the foregoing document was filed electronically and is available for viewing or downloading from the ECF system. This document was electronically served on the registered participants as identified on the notice of electronic filing (NEF).

/s/ Luke T. Cadigan